

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	<u>3500 PROTECTIVE ORDER</u>
	:	
- v. -	:	S1 19 Cr. 875 (SHS)
	:	
DARRIUS CHRISTOPHER,	:	
a/k/a "Papers," and	:	
ROBERT WADE,	:	
a/k/a "Bobby,"	:	
	:	
Defendants.	:	
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Upon the application of the United States of America, Damian Williams, United States Attorney for the Southern District of New York, by and through Mary E. Bracewell and Ryan B. Finkel, Assistant United States Attorneys, of counsel, for an order precluding the dissemination of material produced pursuant to 18 U.S.C. § 3500 and/or *Giglio v. United States*, 405 U.S. 150 (1972) ("3500 Material"), and providing additional protections to a designated subset of the 3500 Material which has been classified as "Attorney's Eyes Only" (collectively, the "Attorney's Eyes Only 3500 Material"), made on consent of defense counsel, and based on the Court's independent review,

IT IS HEREBY ORDERED that (1) defense counsel must destroy or return to the Government all 3500 Material (and any copies thereof) at the conclusion of the trial of this matter or

when any appeal has become final; (2) the defense and the defendants are precluded from disseminating any of the 3500 Material to anyone beyond the defendants, defense counsel, and any paralegal or staff employed by the defense; and (3) the defendants are precluded from taking or keeping any paper copies of the 3500 Material (except for 3500 Material produced for law enforcement agents) with them into any jail facility, whether before, during, or after trial; except that the defendants may review the 3500 Material in the possession of defense counsel or any paralegal or staff employed by the defense, when in the presence of defense counsel or any paralegal or staff employed by the defense.

IT IS FURTHER ORDERED that certain 3500 Materials have been designated "Attorney's Eyes Only 3500 Material." The Attorney's Eyes Only 3500 Material encompasses civilian, victim, and non-testifying witnesses. Such Attorney's Eyes Only 3500 Material, including any copies thereof or excerpts therefrom, or any information contained therein, shall not be disclosed to or possessed by the defendants, and may be disclosed only to defense counsel and to any paralegal or staff employed by the defense. until four days prior to the start of trial, i.e., Thursday, November 19, 2021, absent the Government, in its discretion, consenting in writing to remove the "Attorney's Eyes Only 3500

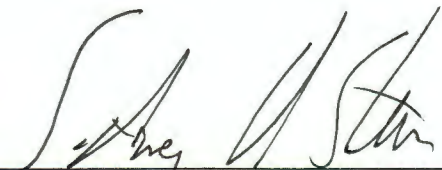
Material" designation prior to that date. In no case shall the defendants be permitted to retain copies, including notes regarding, materials marked as "Attorney's Eyes Only 3500 Material."

IT IS FURTHER ORDERED that the defendants, defense counsel, and any paralegal or staff employed by the defense are precluded from publicly disclosing or disseminating the identity of any civilian witnesses, or victim witnesses referenced in the

[continued on the next page]

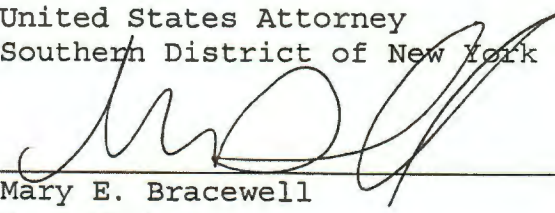
Attorney Eyes' Only 3500 Material until three days prior to the start of trial.


Dated: New York, New York  
November 10, 2021

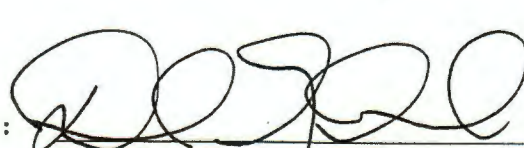
  
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THE HONORABLE SIDNEY H. STEIN  
UNITED STATES DISTRICT JUDGE

Consented to by:

DAMIAN WILLIAMS  
United States Attorney  
Southern District of New York

By:   
\_\_\_\_\_  
Mary E. Bracewell  
Ryan Finkel  
Assistant United States Attorneys

By:   
\_\_\_\_\_  
Steven Brill, Esq.  
James Healy, Esq.  
Attorneys for Darrius Christopher

By:   
\_\_\_\_\_  
David Greenfield, Esq.  
Sarah Sacks, Esq.  
Attorneys for Robert Wade